

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAURA ALLEN, INDIVIDUALLY AND AS)
ADMINISTRATRIX OF THE ESTATE OF)
DAN ALLEN, AND AS NEXT FRIEND)
TAYLOR ALLEN AND DANIELLE ALLEN;)
AND MARK ALLEN)
Plaintiffs,)
) CIVIL ACTION
) NO. 05-40048-FDS
V.)
)
MARTIN SURFACING, A Division of)
SOUTHWEST RECREATIONAL)
INDUSTRIES, INC; SOUTHWEST)
RECREATIONAL INDUSTRIES, INC .,)
d/b/a MARTIN SURFACING;)
)
Defendants.)

**PLAINTIFFS' SUPPLEMENTAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a) AND LOCAL RULE 26.2**

NOW COMES the Plaintiffs and makes the following as their Supplemental

Disclosures:

1. Rule (26.1(b)(2)(a): All Persons Known to this Defendant, Who Witnessed the Occurrence or Have Substantial Discoverable Information Regarding Same:

WITNESSES

1. Reed J. Seaton
2. Robert N. Wolensky
3. Ronald Ryba
4. Dennis Allen
5. Laura Allen
6. Taylor Allen
7. Danielle Allen
8. Mark Allen
9. Persons presently or previously associated with the College of the Holy Cross:
 - i. Richard M. Regan, Jr.

- ii. Scott M. Merrill
- iii. William J. Conley
- iv. William R. Durgin
- v. Rev. Dennis J. Yesalonia, S.J.
- vi. Patricia Morissette
- vii. Gerald A. Zimmermann
- viii. Lenny Raymond
- ix. Paul Bachia
- x. Bob Bradley
- xi. Jim Cavanaugh
- xii. Henry Corazini
- xiii. Leo Fanning
- xiv. Meg Gallagher
- xv. Linda George
- xvi. Bob Griffin
- xvii. Lee Hall
- xviii. Mary Herard
- xix. Larry Napolotano
- xx. Bob Neville
- xxi. Mike Pedone
- xxii. Nina Robinson
- xxiii. Vinny Sinagra
- xxiv. Ann Zelesky

10. Persons presently or previously associated with Southwest Recreational Industries, Inc. d/b/a Martin Surfacing:

- i. Dick McFadden
- ii. Jack McCann
- iii. John T. Beynor
- iv. Harry Coke
- v. Mike Palmer
- vi. Ron Ryba

11. Medical Providers:

- i. Marcie Wolinsky-Friedland, M.D.
- ii. Richard A. Palken, M.D.
- iii. George Zabrecky, M.D.
- iv. Nicholas Smyrnios, M.D.
- v. Mary Kay O'Connor

Plaintiffs reserve the right to supplement their witness list.

2. Rule (26.1(b)(2)(b): All Opposing Parties from whom Statements Have Been Taken:

None.

3. Rule (26.1(b)(2)(b): All Government Agencies Known to Have
Investigated Occurrence:

None.

4. **DOCUMENTS**

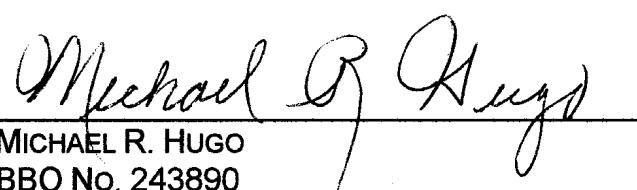
1. Medical Records
Bates Stamped 000231 - 000659
2. Documents received from the College of the Holy Cross
Bates Stamped 000001 – 000230
3. Death Certificate

RESPECTFULLY SUBMITTED
THE PLAINTIFFS
BY THEIR ATTORNEYS



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